

**IN THE UNITED STATES DISTRICT COURT OF ALABAMA  
MIDDLE DISTRICT COURT OF ALABAMA  
NORTHERN DIVISION**

<b>AMANDA TURNER NOBLES,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. 2:05-CV-886</b>
	)	
<b>ZENTA AND PROTOCOL RECOVERY</b>	)	
<b>SERVICES, INC.</b>	)	
	)	
<b>Defendants.</b>	)	

**REPORT OF PARTIES' PLANNING MEETING**

1. Pursuant to Federal Rules of Civil Procedure 26(f), the parties conducted a conference on December 6, 2005 and December 9, 2005, with Andy Nelms, for the plaintiff, Amanda Nobles, and Neal Moore for the defendant, Protocol Recovery Services.

2. Pre-discovery disclosures: The parties will exchange by January 15, 2006, the information required by Federal Rules of Civil Procedure 26(a)(i).

3. Discovery Plan: The parties jointly propose to the court the following discovery plan:

Discovery will be needed on the following subjects: The alleged violations of the Fair Debt Collection Practices Act, the alleged negligent collection efforts of the defendant, the damages alleged by the plaintiff, including mental illness, the plaintiff's credit history, the affirmative defenses in the Complaint, the pro tanto settlement achieved with Zenta, notice of any dispute or

satisfaction of the debt, and any and all contacts with third parties.

All discovery commenced in time to be completed by September 29, 2006

Maximum of 25 interrogatories by each party to any other party (Responses due 30 days after service).

Maximum of 35 requests for admission by each party to any other party (Responses due 30 days after service).

Maximum of five depositions by the plaintiff and five depositions by the defendant.

Each deposition is limited to a maximum of eight hours unless extended by agreement of the parties.

Reports from retained experts under Rule 26(a)(2) due:

from the plaintiff by June 1, 2006;

from the defendant by July 31, 2006.

Supplementations under Rule 26(e) due September 29, 2006.

4. The parties do not request a conference with the court before entry of this scheduling order.
5. The parties request a pre-trial conference in October, 2006.
6. Plaintiff is allowed until June 16, 2006, to join additional parties and to amend the pleadings.
7. Defendant is allowed until July 14, 2006, to join additional parties and to amend the pleadings.
8. All potentially dispositive motions should be filed by August 31, 2006.
9. Settlement is likely.

10. Final lists of witnesses and exhibits under Rule 26(a)(3) should be due from the plaintiff by October 2, 2006. From the defendant by October 20, 2006.

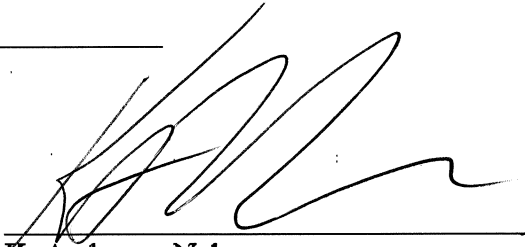
11. The parties shall have seven days after service of the final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

12. The case should be ready for trial by November 6, 2006. It is expected this case will take approximately 3 days to try.

DATE: \_\_\_\_\_

  
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